

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ABRILLIA WILLIAMS,)	
Plaintiff,)	
)	
v.)	
)	
RADIUS GLOBAL SOLUTIONS LLC,)	
)	
Defendant.)	
<hr style="width: 25%; margin-left: 0;"/>)	

COMPLAINT AND JURY DEMAND

NOW COMES THE PLAINTIFF, ABRILLIA WILLIAMS, BY AND THROUGH COUNSEL, BRIAN J. OLSZEWSKI, and for her Complaint against the Defendant, pleads as follows:

JURISDICTION

1. This is an action for damages, brought against a debt collector for violating the Fair Debt Collection Practices Act at 15 U.S.C. § 1692 et seq. ("FDCPA").

VENUE

2. The transactions and occurrences which give rise to this action occurred in Cook County, Illinois.
3. Venue is proper in the Northern District of Illinois.

PARTIES

4. Plaintiff is a natural person residing in the City of Chicago, Cook County, Illinois.
5. The Defendant to this lawsuit is Radius Global Solutions LLC, which is a Minnesota limited liability company that conducts business in the State of Illinois.

GENERAL ALLEGATIONS

6. Defendant is attempting to collect a consumer type debt allegedly owed by Plaintiff to Capital One Bank (USA), N.A. in the amount of \$705.44 (“alleged Debt”).
7. On or about May 9, 2020, Plaintiff received a Demand Letter from Defendant. In the letter, Defendant stated that Plaintiff has 30 days to dispute the validity of the alleged Debt and offered Plaintiff a settlement for the alleged Debt. However, Defendant’s letter did not state that the communication is from a debt collector nor did it advise Plaintiff that Defendant is attempting to collect a debt.
8. On or about May 18, 2020, Credit Repair Lawyers of America, on behalf of Plaintiff, sent Defendant a Cease & Desist and request for validation.
9. On or about August 12, 2020, Plaintiff received a correspondence from Defendant offering her another settlement for the alleged Debt.
10. To date, Plaintiff has not received validation of the alleged Debt.
11. After receiving Plaintiff’s request for validation, Defendant resumed attempts to collect the alleged Debt without validating the alleged Debt, in violation of the FDCPA.
12. Furthermore, Defendant contacted Plaintiff after Defendant was notified that Plaintiff was represented by an attorney and after receiving the Cease & Desist, in violation of the FDCPA.
13. Plaintiff suffered pecuniary and emotional damages as a result of Defendant’s actions.

COUNT I – VIOLATION OF THE FAIR DEBT COLLECTION PRACTICES ACT

14. Plaintiff reincorporates the preceding allegations by reference.
15. At all relevant times Defendant, in the ordinary course of its business, regularly engaged in the practice of collecting debts on behalf of other individuals or entities.

16. Plaintiff is a "consumer" for purposes of the FDCPA and the account at issue in this case is a consumer debt.

17. Defendant is a "debt collector" under the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. §1692a(6).

18. Defendant's foregoing acts in attempting to collect this alleged debt violated the following provisions of the FDCPA:

- a. 15 U.S.C. §1692c by contacting Plaintiff after Defendant was notified that Plaintiff is represented by an attorney and after receiving the Cease & Desist.
- b. 15 U.S.C. §1692e by using deceptive practices to attempt to collect the alleged Debt by making further collection attempts without validating the alleged Debt. Furthermore, Defendant failed to state in its demand letter that the letter is a communication from a debt collector and that Defendant is making an attempt to collect a debt.
- c. 15 U.S.C. §1692g by making further collection attempts without validating the alleged Debt therefore violating Plaintiff's validation rights.

19. To date, and a direct and proximate cause of the Defendant's failure to honor its statutory obligations under the FDCPA, the Plaintiff has continued to suffer from stress and irritation.

20. Plaintiff has suffered economic, emotional, general and statutory damages as a result of these violations of the FDCPA.

WHEREFORE, PLAINTIFF PRAYS THAT THIS HONORABLE COURT enter judgment in her favor and against Defendant for actual damages, statutory damages, costs, and reasonable attorneys' fees as provided by the Fair Debt Collection Practices Act.

JURY DEMAND

Plaintiff hereby demands a trial by Jury.

Respectfully submitted.

/s/ Brian J. Olszewski

Brian J. Olszewski

Law Offices of Michael Lee Tinaglia, Ltd.

444 N. Northwest Hwy., Ste. 350

Park Ridge, IL 60068

Telephone: (847) 692-0421

Fax: (847) 685-8440

bolszewski@tinagliaalaw.com

Attorneys for Plaintiff,

Abrillia Williams